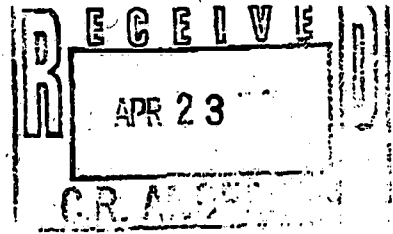




State of New Jersey

Department of Environmental Protection

Christine Todd Whitman
GovernorRobert C. Shinn, Jr.
Commissioner

Mr. Cristopher Anderson
Director, Environmental Affairs
L.E. Carpenter & Company
200 Public Square
Suite 36-5000
Cleveland, OH 44114-2304

APR 17 1997

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection has reviewed the Remedial Action Plan for Phase I - Free Product Recovery dated February 21, 1997 and has the following comments. Please note USEPA's comments will be forwarded under separate cover.

1. According to the work plan, this vapor extraction proposal will remove a greater quantity of product than the original product removal proposal. However, no supporting calculations or assumptions are provided to support this conclusion. The Department wishes to avoid technical arguments at this time, however please note that if this design proves inadequate to accomplish the goal of timely capture and removal of free product the Department will require additional remedial efforts to achieve this goal.
2. The work plan states that one of the key elements to successfully applying Enhanced Fluid Recovery (EFR) is to minimize ground water extraction while maximizing free-product recovery. In addition to the position of the drop pipe within the recovery well, the pumping rate of the free product/ground water based on the applied vacuum (approximately 22-inches of mercury) and procedures for controlling the water level and flow rates during operation of the extraction system should be determined. The rationale for applying 22-inches of mercury to the individual recovery wells needs to be clarified.
3. The work plan should discuss the basis for the pumping schedule outlined under Section 3. For example, it seems as though the schedule could be condensed to 6 months as opposed to a year if pumping occurred on a daily basis in the beginning or several times a week for the first month.



Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,



Gwen Barunas, Case Manager
Bureau of Federal Case Management

c: Stephen Cipot, USEPA
John Prendergast, BEERA
George Blyskun, BGWPA